

JENNER & BLOCK LLP

Reid J. Schar (*pro hac vice*)

RSchar@jenner.com

353 N. Clark Street

Chicago, IL 60654-3456

Telephone: +1 312 222 9350

Facsimile: +1 312 527 0484

CLARENCE DYER & COHEN LLP

Kate Dyer (Bar No. 171891)

kdyer@clarencedyer.com

899 Ellis Street

San Francisco, CA 94109-7807

Telephone: +1 415 749 1800

Facsimile: +1 415 749 1694

CRAVATH, SWAINE & MOORE LLP

Kevin J. Orsini (*pro hac vice*)

korsini@cravath.com

825 Eighth Avenue

New York, NY 10019

Telephone: +1 212 474 1000

Facsimile: +1 212 474 3700

Attorneys for Defendants PACIFIC GAS AND ELECTRIC COMPANY

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,

Plaintiff,

v.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**PACIFIC GAS AND ELECTRIC
COMPANY'S SUPPLEMENTAL
RESPONSE TO REQUEST FOR
INFORMATION**

Judge: Hon. William Alsup

Date: August 16, 2019

1 PG&E writes to provide additional detail regarding statements in its July 31, 2019 submission
2 that the Caribou-Palermo 115 kV Transmission Line has been permanently de-energized to avoid any
3 misunderstanding of what the de-energization of the line entails.

4 The Caribou-Palermo 115 kV Transmission Line has two sections: a northern section and a
5 southern section. Both sections of the Caribou-Palermo 115 kV Transmission Line have been
6 permanently de-energized.

7 The northern section of the line is approximately 36 miles long and runs from Caribou
8 Powerhouse to the Big Bend Switching Station. This section of the line is supported by single-circuit
9 towers that carry only one transmission line—the now de-energized Caribou-Palermo 115 kV
10 Transmission Line. Tower :27/222, where the Camp Fire originated, is located along this section,
11 approximately 10 miles north of the Big Bend Switching Station.

12 The southern section of the line is of a different vintage and construction than the northern
13 section and runs from the Big Bend Switching Station to Palermo Substation (a distance of
14 approximately 16 miles). Between the Big Bend Switching Station and the Palermo Substation, nearly
15 all of the towers are double-circuit towers that support both the de-energized Caribou-Palermo 115 kV
16 Transmission Line, as well as other transmission lines or lower-voltage distribution lines that remain
17 energized. Consistent with PG&E's Wildfire Safety Inspection Program, all such transmission towers
18 located in Tier 2 and Tier 3 High Fire-Threat District areas that support energized lines have been
19 subjected to PG&E's enhanced climbing and drone inspections prior to the 2019 fire season. All of
20 the highest-priority conditions identified during PG&E's enhanced inspections of these towers were
21 addressed or made safe by February 2019.

Respectfully Submitted,

Dated: August 16, 2019

JENNER & BLOCK LLP

By: /s/ Reid J. Schar
Reid J. Schar (*pro hac vice*)

CRAVATH, SWAINE & MOORE LLP

By: /s/ Kevin J. Orsini
Kevin J. Orsini (*pro hac vice*)

CLARENCE DYER & COHEN LLP

By: /s/ Kate Dyer
Kate Dyer (Bar No. 171891)

Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY